

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

SAFECO INSURANCE COMPANY OF
AMERICA, as Subrogee of
VINCENT A. PACITTI, JR.

V.

ANDALUSIA WHOLESALE SUPPLY, INC.
a/k/a ANDALUSIA ROOFING SUPPLY and
SOUTHAMPTON ROOFING & SIDING, INC.
a/k/a SOUTHAMPTON ROOFING &
CONTRACTORS, INC.

CIVIL ACTION - LAW

JURY TRIAL DEMANDED

NO. 02-3427

**INITIAL DISCLOSURES OF DEFENDANT, ANDALUSIA SUPPLY
COMPANY, INC. (INCORRECTLY DESIGNATED AS ANDALUSIA
WHOLESALE SUPPLY, INC. a/k/a ANDALUSIA ROOFING SUPPLY)
PURSUANT TO FED. R.CIV.P. 26(a)(1)**

A. Name, address, and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses

1. Tom Egan, President, Andalusia Supply Company, Inc., 850 Highland Avenue, Bensalem, Pennsylvania 19028, telephone number (215) 639-2099. Mr. Egan has knowledge regarding the business of Andalusia Supply Company, Inc., the delivery of materials to 3716 Glenn Street, Philadelphia, Pennsylvania and the order placed by Southampton Roofing & Siding, Inc. for the subject roofing materials;

2. Carlos Raymond, Andalusia Supply Company, Inc., 850 Highland Avenue, Bensalem, Pennsylvania 19028, telephone number (215) 639-2099. Mr. Raymond was present at 3716 Glenn Street, Philadelphia, Pennsylvania on the date of the delivery and has knowledge regarding same;

3. William Repash, 1009 Bristol Pike, Bensalem, Pennsylvania 19020. Mr. Repash was employed by Andalusia Supply Company, Inc. on the date of the subject incident, was present at 3716 Glenn Street, Philadelphia, Pennsylvania on the date of the delivery and has knowledge regarding same;

4. John Norton, President, Southampton Roofing & Siding, Inc., 975 Second Street Pike, Richboro, Pennsylvania 18954. Mr. Norton has knowledge regarding the order placed with Andalusia Supply Company, Inc. and the manner of delivery of the roofing materials; and,

5. Vincent A. Pacitti, 3716 Glenn Street, Philadelphia, Pennsylvania 19114. Mr. Pacitti will have information regarding the purchase of the subject residence, the condition of the subject residence at the time of the incident, his agreement with Southampton Roofing & Siding, Inc. and the damages sustained to his residence and its contents as a result of the subject incident.

B. Copy or description of all documents, data compilations and tangible things in the possession, custody or control of Andalusia Supply Company, Inc.

____ 1. Statement of Carlos Raymond.

2. Andalusia Supply Company, Inc. Order No. 35723 to Southampton Roofing.

C. Computation of any category of any damages claimed by the disclosing party

Not applicable.

D. Insurance Agreement

Andalusia Supply Company, Inc. is insured by Great American Insurance Company under Policy Number: SPP-903-43-08-03, effective June 2, 1999 through June 2, 2000 with policy limits of \$1,000,000.00 per occurrence. A true and correct copy of that policy will be made available for inspection and copying at the offices of counsel for Defendant upon request.

SWEENEY & SHEEHAN

By: _____

J. Michael Kunsch
Identification No. 61922
Attorney for Defendant,
Andalusia Supply Company, Inc.

1515 Market Street, 19th Floor
Philadelphia, Pennsylvania 19102
(215) 563-9811

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SAFECO INSURANCE COMPANY OF	:	CIVIL ACTION - LAW
AMERICA, as Subrogee of	:	
VINCENT A. PACITTI, JR.	:	
	:	
v.	:	
	:	<u>JURY TRIAL DEMANDED</u>
ANDALUSIA WHOLESALE SUPPLY, INC.	:	
a/k/a ANDALUSIA ROOFING SUPPLY and	:	
SOUTHAMPTON ROOFING & SIDING, INC.	:	
a/k/a SOUTHAMPTON ROOFING &	:	
CONTRACTORS, INC.	:	NO. 02-3427

CERTIFICATION OF SERVICE

I do hereby certify that service of a true and correct copy of the within Initial Disclosures of Defendant, Andalusia Supply Company, Inc., Pursuant to Fed. R. Civ. P. 26(a)(1), was made on September 4, 2002 to all counsel of record by United States First Class Mail, postage prepaid.

SWEENEY & SHEEHAN

By: _____

J. Michael Kunsch
Identification No. 61922
Attorney for Defendant,
Andalusia Wholesale Supply, Inc.

1515 Market Street
Suite 1900
Philadelphia, Pennsylvania 19102
(215) 563-9811